

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106-4614
(702) 382-2101

Adam P. Segal, Esq.
Nevada Bar No. 6120
Bryce C. Loveland, Esq.
Nevada Bar No. 10132
Clark V. Vellis, Esq.
Nevada Bar No. 5533
BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106-4614
Telephone (702) 382-2101
Facsimile: (702) 382-8135
Email: asegal@bhfs.com
Email: bcloveland@bhfs.com
Email: cvellis@bhfs.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TRUSTEES OF THE PLUMBERS AND
PIPEFITTERS LOCAL 525 HEALTH AND
WELFARE TRUST AND PLAN;
TRUSTEES OF THE PLUMBERS AND
PIPEFITTERS UNION LOCAL 525
PENSION PLAN; AND THE TRUSTEES
OF PLUMBERS AND PIPEFITTERS
LOCAL UNION 525 APPRENTICE AND
JOURNEYMAN TRAINING TRUST FOR
SOUTHERN NEVADA,

Plaintiffs,

v.

T.E.N. MECHANICAL CORP., a Nevada
corporation; NICHOLAS R. WOJTASZEK,
an individual; and M & H ENTERPRISES,
INC., a Nevada corporation doing business as
MARTIN-HARRIS CONSTRUCTION,

Defendants.

Case No. 2:10-cv-02258-RLH-NJK

**NOTICE OF SETTLEMENT, AND
REQUEST AND ORDER FOR STAY OF
PROCEEDINGS**

Plaintiffs, Trustees of the Plumbers and Pipefitters Union Local 525 Health and Welfare
Trust and Plan, Trustees of the Plumbers and Pipefitters Union Local 525 Pension Plan, and

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106-4614
(702) 382-2101

1 Trustees of the Plumbers and Pipefitters Local Union 525 Apprentice and Journeyman Training
2 Trust for Southern Nevada (collectively “Trust Funds”) and Defendant M&H Enterprises, Inc. a
3 Nevada corporation doing business as Martin-Harris Construction (“Martin-Harris”), and
4 Defendant Nicholas R. Wojtaszek (“Wojtaszek”) by and through the undersigned counsel, hereby
5 give notice that they have reached a settlement in principle, and request that the Court stay all
6 proceedings for 45 days (including the deadline for filing dispositive motions currently set for
7 July 1, 2013, and the deadline for filing the pretrial order currently set for July 31, 2013), while
8 the parties take steps to finalize settlement.
9

10 ///

11
12
13 ///

14
15
16
17 ///

18
19
20 ///

21
22
23
24 ///

25
26
27 ///

1 Within 45 days, and on full and final settlement between the Trust Funds, Martin-Harris
2 and Wojtaszek, they (through their counsel) will file a stipulated dismissal.

3
4 BROWNSTEIN HYATT FARBER
5 SCHRECK, LLP

MARQUIS AURBACH COFFING

6 /s/ Bryce C. Loveland
7 Adam P. Segal, Esq.
8 Bryce C. Loveland, Esq.
9 Clark V. Vellis, Esq.
10 100 North City Parkway, Suite 1600
11 Las Vegas, Nevada 89106-4614
12 Attorneys for Plaintiffs

/s/ Frank M. Flansburg
Frank M. Flansburg III, Esq.
Keith D. Williams, Esq.
10004 Park Run Drive
Las Vegas, Nevada 89145

Attorneys for M&H Enterprises, Inc.
d/b/a Martin-Harris Construction

11 Dated: July 1, 2013.

Dated: July 1, 2013.

12 ATKINSON, ANDELSON, LOYA, RUUD
13 & ROMO

14 /s/ Steven D. Atkinson
15 Steven D. Atkinson, Esq.
16 12800 Center Court Drive, Suite 300
Cerritos, California 90703

17 Attorneys for Defendant Nicholas R.
18 Wojtaszek

19 Dated: July 1, 2013.

20 **ORDER**

21 **IT IS SO ORDERED.**

22
23 
24 ~~UNITED STATES DISTRICT JUDGE /~~
UNITED STATES MAGISTRATE JUDGE

25 Dated: July 2, 2013
26
27
28

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106-4614
(702) 382-2101